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8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN DISTRICT OF INDIANA**  
10 **FORT WAYNE DIVISION**

11 GLOBAL ARCHERY PRODUCTS, INC.,

12 Plaintiff,

13 v.

14 JORDAN GWYTHER d/b/a/ LARPING.ORG  
15 and UPSHOT ARROWS,

16 Defendant.

Civil Action No. 1:15-cv-00297-JVB-SLC

DECLARATION OF MARK P. WALTERS  
IN SUPPORT OF DEFENDANT'S  
RESPONSE TO PLAINTIFF'S MOTION  
TO STAY DISCOVERY

17 I, Mark P. Walters, hereby state and declare as follows:

18 1. I am one of the attorneys representing the defendant, Jordan Gwyther, in  
19 the above-captioned matter. I make the following statements under penalty of perjury, in support  
20 of Defendant's Response to Plaintiff's Motion to Stay Discovery.  
21


22 2. Attached as Exhibit A is a true and correct copy of Plaintiff's First  
23 Interrogatories.

24 3. Attached as Exhibit B is a true and correct copy of Plaintiff's First  
25 Requests for Production.  
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27 DECLARATION OF MARK P. WALTERS IN SUPPORT  
OF DEFENDANT'S RESPONSE TO PLAINTIFF'S  
MOTION TO STAY DISCOVERY - 1

Civil Action No. 1:15-cv-00297-JVB-SLC  
JORD-6-1001P11 DEC\_MPW in SUPP MSTY

LOWE GRAHAM JONES PLC

  
701 Fifth Avenue, Suite 4800  
Seattle, Washington 98104  
206.381.3300 • F: 206.381.3301

1           4.           Mr. Gwyther responded to Plaintiff's first interrogatories and requests for  
2 production within the seven (7) time-frame by producing responses and objections; documents  
3 produced subject to objections were produced the following day.

4           5.           On February 26, 2016, the Court ordered the parties to brief the issues of  
5 personal jurisdiction and venue. That briefing was complete as of April 15, 2016.

6           6.           Attached as Exhibit C is a true and correct copy of Mr. Gwyther's Notice  
7 of Deposition for Mr. John Jackson.

8           7.           Attached as Exhibit D is a true and correct copy of Mr. Gwyther's initial  
9 disclosures.  
10

11          8.           Attached as Exhibit E is a true and correct copy of Plaintiff's initial  
12 disclosures.

13          9.           Mr. Jackson is an owner and principal of Plaintiff Global Archery.

14          10.          Attached as Exhibit F is a true and correct copy of an email exchange  
15 between counsel for Plaintiff, Dean McConnell and me that occurred over April 1, 2016 to April  
16 14, 2016.  
17

18          11.          Attached as Exhibit G is a true and correct copy of my letter to counsel for  
19 Plaintiff dated May 3, 2016.

20          12.          Attached as Exhibit H is a true and correct copy of an email from counsel  
21 for Plaintiff to me dated May 3, 2016.  
22

23               DATED: May 9, 2016

24                               s/Mark P. Walters

25                               Mark P. Walters at Seattle, King County, WA  
26  
27

DECLARATION OF MARK P. WALTERS IN SUPPORT  
OF DEFENDANT'S RESPONSE TO PLAINTIFF'S  
MOTION TO STAY DISCOVERY - 2

Civil Action No. 1:15-cv-00297-JVB-SLC  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 9, 2016, I electronically served the foregoing with this  
**CERTIFICATE OF SERVICE** upon the following attorney of record:

Dean E. McConnell  
9795 Crosspoint Blvd., Suite 185  
Indianapolis, IN 46256  
[dean@dean-mcconnell.com](mailto:dean@dean-mcconnell.com)

*Attorney for Global Archery Products, Inc.*

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*Attorney for Amicus Curiae Electronic Frontier Foundation*

LOWE GRAHAM JONES<sup>PLLC</sup>

s/Laurie Gero  
Laurie Gero

DECLARATION OF MARK P. WALTERS IN SUPPORT  
OF DEFENDANT'S RESPONSE TO PLAINTIFF'S  
MOTION TO STAY DISCOVERY - 3

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